

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

CYNTHIA K. HAYNES (a/k/a Cynthia K. )  
Randolph), individually and under the Missouri )  
Wrongful Death Statute )  
Plaintiff, )  
vs. ) Case No: 1:21-CV-00160-ACL  
JENNIFER WILLIAMS, individually, et al. )  
Defendants. )

**WILLIAMS' CONSENTED MOTION FOR ADDITIONAL TIME TO FILE A  
RESPONSE TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY**

Come Now, Defendants, Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law, (collectively, "Williams"), by and through their undersigned counsel, and for their Consented Motion for Additional Time to File a Response to Plaintiff's Motion to Compel Discovery from Defendant Williams, up through and including November 23, 2022 :

1. On November 07, 2022, Plaintiff filed her Motion to Compel Discovery from Williams ("Motion to Compel") and a Memorandum in Support ("Memorandum in Support") of the Motion to Compel. [Docs. 100 and 101].
2. Pursuant to Local Rule 4.01(B), Williams' response to Plaintiff's Motion to Compel is due to be filed on or before November 21, 2022.
3. Williams respectfully requests this Court allow Williams an extension of time of two (2) days, up through and including November 23, 2022, to file a response to the Motion to Compel.
4. The additional time is necessary for Williams to fully evaluate the arguments raised in Plaintiff's responses to the Motion to Compel and Memorandum in Support and to research the

issues legal authority discussed therein and due to the associated counsels' other professional obligations and scheduling issues, including those related to the upcoming Thanksgiving holiday.

5. On November 16, 2022, Plaintiff's counsel consented via email for Williams to receive from this Court an extension of two (2) days, up through and including November 23, 2022 to file a response to the Motion to Compel.

6. Granting Williams' request for additional time is not done to prejudice any of the parties to this cause of action or to cause undue delay in these proceedings.

WHEREFORE, Defendants Jennifer Williams, individually, and Jennifer Williams, d/b/a Williams Law respectfully request that this Court enter an Order extending the deadline for Williams to file a response to Plaintiff's Motion to Compel Discovery from Defendant Williams, up through and including September 23 2022, and for such other relief the Court deems necessary under the circumstances.

Respectfully submitted,

ROBERTS PERRYMAN, P.C.

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Attorneys for Defendants Jennifer Williams and  
Jennifer Williams d/b/a Williams Law

**CERTIFICATE OF SERVICE**

I hereby certify that on November 17, 2022, the foregoing was electronically filed with the Clerk of the Court using CM/ECF electronic filing system which will send notification of such filing to the following and email to all counsel of record.

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